

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,

Debtors.

FTX TRADING LTD. and MACLAURIN
INVESTMENTS LTD.,

Plaintiffs,

-against-

LOREM IPSUM UG, PATRICK GRUHN,
ROBIN MATZKE, and BRANDON WILLIAMS,

Defendants.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Adv. Pro. No. 23-50437 (JTD)

**DEFENDANTS PATRICK GRUHN, ROBIN MATZKE, AND LOREM IPSUM UG’S
JOINDER IN MOTION FOR A PROTECTIVE ORDER STAYING DISCOVERY**

Defendants Patrick Gruhn (“**Gruhn**”), Robin Matzke (“**Matzke**”), and Lorem Ipsum UG (“**Lorem Ipsum**,” together with Gruhn and Matzke, “**LI Defendants**”), through the undersigned counsel, hereby join and adopt the arguments stated in Defendant Brandon Williams’ *Motion For a Protective Order Staying Discovery* (“**Motion**”) (Adv. Pro. No. 35) and the *Opening Brief* filed in support thereof (Adv. Pro. No. 35-1).

WHEREFORE, the LI Defendants respectfully request that this Court issue an order granting the Motion and stay discovery pending the final disposition of the LI Defendants’ motions to dismiss the chapter 11 proceedings of Maclaurin Investments Ltd. [D.I. 3399] and FTX Trading

DE:4893-9308-4560.1 53169.001

#12556852v2\031263\0002

Ltd. [D.I. 3400] on the grounds more fully set forth therein, but including for lack of subject matter jurisdiction.

Dated: November 14, 2023
Wilmington, Delaware

/s/ Peter J. Keane

Laura Davis Jones (DE Bar No. 2436)
Peter J. Keane (DE Bar No. 5503)
PACHULSKI STANG ZIEHL & JONES LLP
919 North Market Street, 17th Floor
P.O. Box 8705
Wilmington, Delaware 19801
Telephone: (302) 652-4100
Facsimile: (302) 652-4400
Email: ljones@pszjlaw.com
pkeane@pszjlaw.com

THE DALEY LAW FIRM LLC
Darrell Daley (admitted *pro hac vice*)
Samantha Neal (admitted *pro hac vice*)
4845 Pearl East Circle, Suite 101
Boulder, Colorado 80301
Telephone: (303) 479-3500
Email: Darrell@daleylawyers.com
Samantha@daleylawyers.com

- and -

MORRISON COHEN LLP
Joseph T. Moldovan (admitted *pro hac vice*)
Heath D. Rosenblat (admitted *pro hac vice*)
Jason P. Gottlieb (admitted *pro hac vice*)
Michael Mix (admitted *pro hac vice*)
909 Third Avenue, 27th Floor
New York, New York 10022
Telephone: (212) 735-8600
Facsimile: (212) 735-8708
Email: jmoldovan@morrisoncohen.com
hrosenblat@morrisoncohen.com
jgottlieb@morrisoncohen.com
mmix@morrisoncohen.com

*Counsel to Patrick Gruhn, Robin Matzke,
and Lorem Ipsum UG*